

110 N. Minnesota Ave , Suite 400 Sioux Falls, SD 57104 Phone (605) 332-5999 • Fax (605) 332-4249 909 Saint Joseph Street, Suite 800 Rapid City, SD 57701 Phone (605) 342-2592 • Fax (605) 342-5185 311 N. 27th Street, Suite 4 Spearfish, SD 57783 Phone (605) 722-9000 • Fax (605) 722-9001

# REPLY TO: Rapid City Office From the offices of Cassidy M. Stalley

e-mail address: cstalley@lynnjackson.com Sender's Direct Line: 605-791-6488

September 29, 2021

#### VIA E-MAIL ONLY (scott@janklowabdallah.com)

Mr. Scott A. Abdallah Johnson, Janklow, Abdallah & Reiter LLP 101 South Main Avenue, Suite 100 PO Box 2348 Sioux Falls, SD 57101-2348

## VIA E-MAIL ONLY (mjackley@gpna.com)

Mr. Marty J. Jackley Gunderson, Palmer, Nelson & Ashmore, LLP 111 W. Capitol Avenue, Suite 230 Pierre, SD 57501

## VIA E-MAIL ONLY (ron@janklowabdallah.com)

Mr. Ronald A. Parsons, Jr. Johnson, Janklow, Abdallah & Reiter, LLP PO Box 2348 Sioux Falls, SD 57101-2348

Re: U.S. v Kilgallon, et al.

Court File No. 1:21-cr-10023-BCB

Our File No. 210119-00001

#### Dear Counsel:

Enclosed please find the subpoenas that were served today regarding Mr. Houghtaling and Mr. Mosteller's cell phone records.

EXHIBIT

A

Mr. Scott A. Abdallah Mr. Marty J. Jackley Mr. Ronald A. Parsons, Jr. September 29, 2021 Page 2

We will provide you with copies of the information we receive.

Sincerely,

LYNN, JACKSON, SHULTZ & LEBRUN, P.C.

Cassidy M. Stalley

CAS:smb Enclosures

### UNITED STATES DISTRICT COURT DISTRICT OF SOUTH DAKOTA NORTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 1:21-cr-10023-BCB

Plaintiff,

VS.

JOHN KILGALLON, DANIEL C. MOSTELLER and STEPHEN HOUGHTALING,

Defendants.

SUBPOENA DUCES TECUM TO VERIZON WIRELESS

TO: Verizon

Attn: VSAT

180 Washington Valley Road

Bedminster, NJ 07921 Fax: 1.888.667.0028

You are hereby commanded and required to produce to the law offices of Lynn, Jackson, Shultz & Lebrun, P.C., 909 Saint Joseph Street, Suite 800, Rapid City, SD 57701, on or before October 13, 2021, by 5:00 p.m., the following named document now in your custody, under your control, or retained by your company and/ or agents or employees:

1. A list or report of all incoming and outgoing calls, call detail, text messages, picture detail, and internet sessions for cellular telephone number (605) from March 1, 2021 to May 12, 2021, including the times of usage initiated and duration of use.

**ISSUED** this 29th day of day of September, 2021, on behalf of the Honorable Brian C. Buescher of the United States District Court, District of South Dakota, Northern Division.

Dated this 29th day of September, 2021.

### LYNN, JACKSON, SHULTZ & LEBRUN, P.C.

By: /s/ Cassidy M. Stalley

Cassidy M. Stalley
Thomas G. Fritz
Special Prosecutor for the United States of
America
909 St. Joseph Street, Suite 800
Rapid City, SD 57701-3301
(605) 342-2592
cstalley@lynnjackson.com
tfritz@lynnjackson.com

#### CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2021, I sent to:

Verizon Attn: VSAT

180 Washington Valley Road

Bedminster, NJ 07921 Fax: 1.888.667.0028

by facsimile transmission, a true and correct copy of the **Subpoena Duces Tecum to Verizon Wireless** relative to the above-entitled matter.

The undersigned further certifies that on September 29, 2021, I caused the foregoing document to be served electronically via e-mail upon the following:

Mr. Ronald A. Parsons, Jr. Johnson, Janklow, Abdallah & Reiter, LLP PO Box 2348 Sioux Falls, SD 57101-2348 ron@janklowabdallah.com Mr. Scott A. Abdallah Johnson, Janklow, Abdallah & Reiter LLP PO Box 2348 Sioux Falls, SD 57101-2348 scott@janklowabdallah.com

Mr. Marty J. Jackley
Gunderson, Palmer, Nelson & Ashmore,
LLP
111 W. Capitol Avenue, Suite 230
Pierre, SD 57501
mjackley@gpna.com

/s/ Cassidy M. Stalley
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